

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

ROWENA WAGNER,)	Civil Action No. 04-264 ERIE
)	Judge Sean J. McLaughlin
Plaintiff)	
)	
v.)	ELECTRONICALLY FILED
)	
CRAWFORD CENTRAL SCHOOL)	
DISTRICT, et al.)	
)	
Defendants)	

MOTION TO QUASH PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT

AND NOW COME Defendants, Crawford Central School District ("District"), Crawford Central School Board ("Board"), District Superintendent Michael Dolecki ("Dolecki") and District Assistant Superintendent Charles Heller ("Heller") (collectively the "Defendants"), and file the within motion to quash Plaintiff's motion for summary judgment.

1. This Honorable Court established a scheduling order, directing that all dispositive motions be filed by June 26, 2006.
2. Plaintiff filed her motion for summary judgment on or about July 24, 2006, nearly a month after the date specifically ordered by the Court.
3. Because of Plaintiff's extreme tardiness in filing her motion, Defendants request that this Court's scheduling order be enforced and Plaintiff's motion for summary judgment be quashed.

WHEREFORE, for the above reasons, Defendants respectfully request that this Honorable Court quash Plaintiff's motion for summary judgment and consider Plaintiff's memorandum in support of summary judgment as a response in opposition to Defendants' motion for summary judgment only.

Respectfully submitted,

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